

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

—X

BROOKE TAYLOR, CIELO JEAN GIBSON,
JESSICA BURCIAGA, DESSIE MITCHESON,
SARA UNDERWOOD, CORA SKINNER,
RACHEL KOREN, TIFFANY TOTH, LINA
POSADA, DANIELLE RUIZ, CLARK GILMER,
CAMILA DAVALOS, MARIANA DAVALOS, JAIME
EDMONDSON, LAURIE FETTER JACOBS,
NATALIA VELEZ, JESSA HINTON, ERIKA
SCHWEGLER, URSULA MAYES, KIM COZZENS,
JENNIFER WALCOTT ARCHULETA, PAOLA CANAS,
ROSIE JONES, MELANIE IGLESIAS, and
ARIANNY CELESTE,

Case No.: 16-cv-567

ANSWER

Plaintiffs,

-against-

44TH ENTERPRISES CORP., d/b/a DIAMOND
CLUB GENTLEMAN'S CABARET, MLB
ENTERPRISE CORP., d/b/a LACE GENTLEMEN'S
CLUB, ANTHONY CAPECI, LACE ENTERTAINMENT,
INC, d/b/a LACE GENTLEMAN'S CLUB, GLEN
ORECCHIO, STILETTO ENTERTAINMENT, LLC,
d/b/a STILETTO'S, and MICHAEL ORECCHIO,

Defendants.

—X

Defendants, LACE ENTERTAINMENT, INC, d/b/a LACE GENTLEMAN'S CLUB,
GLEN ORECCHIO, STILETTO ENTERTAINMENT, LLC, d/b/a STILETTO'S, and
MICHAEL ORECCHIO, by their attorneys, FAUST GOETZ SCHENKER & BLEE, as and for
their answer to the Plaintiffs Complaint, respectfully allege:

BACKGROUND

1. Deny knowledge and information sufficient to form a belief as to those allegations
set forth in paragraph numbered 1, and leave all matters of law to the Honorable Court.

2. Deny each and every allegation set forth in the paragraph numbered 2, and leave all matters of law to the Honorable Court.

3. Deny each and every allegation set forth in the paragraph numbered 3, and leave all matters of law to the Honorable Court.

4. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 4, and leave all matters of law to the Honorable Court.

JURISDICTION & VENUE

5. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 5, and leave all matters of law to the Honorable Court.

6. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 6, and leave all matters of law to the Honorable Court.

7. Deny each and every allegation set forth in the paragraph numbered 7, except admit that Defendants, LACE ENTERTAINMENT, INC, d/b/a LACE GENTLEMAN'S CLUB, and STILETTO ENTERTAINMENT, LLC, d/b/a STILETTO'S, conduct business in the state of New York, and leave all matters of law to the Honorable Court.

8. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 8, and leave all matters of law to the Honorable Court.

9. Deny each and every allegation set forth in the paragraph numbered 9, and leave all matters of law to the Honorable Court.

PARTIES

Plaintiffs

10. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 10, and leave all matters of law to the Honorable Court.

11. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 11, and leave all matters of law to the Honorable Court.

12. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 12, and leave all matters of law to the Honorable Court.

13. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 13, and leave all matters of law to the Honorable Court.

14. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 14, and leave all matters of law to the Honorable Court.

15. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 15, and leave all matters of law to the Honorable Court.

16. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 16, and leave all matters of law to the Honorable Court.

17. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 17, and leave all matters of law to the Honorable Court.

18. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 18, and leave all matters of law to the Honorable Court.

19. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 19, and leave all matters of law to the Honorable Court.

20. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 20, and leave all matters of law to the Honorable Court.

21. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 21, and leave all matters of law to the Honorable Court.

22. Deny knowledge and information sufficient to form a belief as to those allegations

set forth in paragraph numbered 22, and leave all matters of law to the Honorable Court.

23. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 23, and leave all matters of law to the Honorable Court.

24. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 24, and leave all matters of law to the Honorable Court.

25. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 25, and leave all matters of law to the Honorable Court.

26. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 26, and leave all matters of law to the Honorable Court.

27. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 27, and leave all matters of law to the Honorable Court.

28. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 28, and leave all matters of law to the Honorable Court.

29. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 29, and leave all matters of law to the Honorable Court.

30. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 30, and leave all matters of law to the Honorable Court.

31. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 31, and leave all matters of law to the Honorable Court.

32. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 32, and leave all matters of law to the Honorable Court.

Defendants

33. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 33, and leave all matters of law to the Honorable Court.

34. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 34, and leave all matters of law to the Honorable Court.

35. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 35, and leave all matters of law to the Honorable Court.

36. Deny each and every allegation set forth in the paragraph numbered 36, except admit that Defendant, LACE ENTERTAINMENT, INC, d/b/a LACE GENTLEMAN'S CLUB, conducts business in the state of New York, and leave all matters of law to the Honorable Court.

37. Deny each and every allegation set forth in the paragraph numbered 37, except admit that Defendant, GLEN ORECCHIO, resides in the state of New York, and leave all matters of law to the Honorable Court.

38. Deny each and every allegation set forth in the paragraph numbered 36, except admit that Defendant, STILETTO ENTERTAINMENT, LLC, d/b/a STILETTO'S, conducts business in the state of New York, and leave all matters of law to the Honorable Court.

39. Deny each and every allegation set forth in the paragraph numbered 37, except admit that Defendant, MICHAEL ORECCHIO, resides in the state of New York, and leave all matters of law to the Honorable Court

40. Deny each and every allegation set forth in the paragraph numbered 40, and leave all matters of law to the Honorable Court.

FACTUAL ALLEGATIONS

41. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 41, and leave all matters of law to the Honorable Court.

42. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 42, and leave all matters of law to the Honorable Court.

43. Deny each and every allegation set forth in the paragraph numbered 43, and leave all matters of law to the Honorable Court.

44. Upon information and belief deny those allegations set forth in paragraph numbered 44, and leave all matters of law to the Honorable Court.

45. Deny each and every allegation set forth in the paragraph numbered 45, and leave all matters of law to the Honorable Court.

Plaintiffs' Backgrounds and Careers

46. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 46.

47. Deny each and every allegation set forth in the paragraph numbered 47, and leave all matters of law to the Honorable Court.

48. Upon information and belief deny those allegations set forth in paragraph numbered 48, and leave all matters of law to the Honorable Court.

49. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 49.

50. Deny each and every allegation set forth in the paragraph numbered 50, and leave all matters of law to the Honorable Court.

51. Upon information and belief deny those allegations set forth in paragraph numbered 51, and leave all matters of law to the Honorable Court.

52. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 52.

53. Deny each and every allegation set forth in the paragraph numbered 53, and leave all matters of law to the Honorable Court.

54. Upon information and belief deny those allegations set forth in paragraph numbered 54, and leave all matters of law to the Honorable Court.

55. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 55.

56. Deny each and every allegation set forth in the paragraph numbered 56, and leave all matters of law to the Honorable Court.

57. Upon information and belief deny those allegations set forth in paragraph numbered 57, and leave all matters of law to the Honorable Court.

58. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 58.

59. Deny each and every allegation set forth in the paragraph numbered 59, and leave all matters of law to the Honorable Court.

60. Upon information and belief deny those allegations set forth in paragraph numbered 60, and leave all matters of law to the Honorable Court.

61. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 61.

62. Deny each and every allegation set forth in the paragraph numbered 62, and leave all matters of law to the Honorable Court.

63. Upon information and belief deny those allegations set forth in paragraph numbered 63, and leave all matters of law to the Honorable Court.

64. Deny knowledge and information sufficient to form a belief as to those allegations

set forth in paragraph numbered 64.

65. Deny each and every allegation set forth in the paragraph numbered 65, and leave all matters of law to the Honorable Court.

66. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 66, and leave all matters of law to the Honorable Court.

67. Upon information and belief deny those allegations set forth in paragraph numbered 67, and leave all matters of law to the Honorable Court.

68. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 68.

69. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 69, and leave all matters of law to the Honorable Court.

70. Upon information and belief deny those allegations set forth in paragraph numbered 70, and leave all matters of law to the Honorable Court.

71. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 71.

72. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 72, and leave all matters of law to the Honorable Court.

73. Upon information and belief deny those allegations set forth in paragraph numbered 73, and leave all matters of law to the Honorable Court.

74. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 74.

75. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 75, and leave all matters of law to the Honorable Court.

76. Upon information and belief deny those allegations set forth in paragraph numbered 76, and leave all matters of law to the Honorable Court.

77. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 77.

78. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 78, and leave all matters of law to the Honorable Court.

79. Upon information and belief deny those allegations set forth in paragraph numbered 79, and leave all matters of law to the Honorable Court.

80. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 80.

81. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 81.

82. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 82, and leave all matters of law to the Honorable Court.

83. Upon information and belief deny those allegations set forth in paragraph numbered 83, and leave all matters of law to the Honorable Court.

84. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 84.

85. Deny each and every allegation set forth in the paragraph numbered 85, and leave all matters of law to the Honorable Court.

86. Upon information and belief deny those allegations set forth in paragraph numbered 86, and leave all matters of law to the Honorable Court.

87. Deny knowledge and information sufficient to form a belief as to those allegations

set forth in paragraph numbered 87.

88. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 88, and leave all matters of law to the Honorable Court.

89. Upon information and belief deny those allegations set forth in paragraph numbered 89, and leave all matters of law to the Honorable Court.

90. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 90.

91. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 91, and leave all matters of law to the Honorable Court.

92. Upon information and belief deny those allegations set forth in paragraph numbered 92, and leave all matters of law to the Honorable Court.

93. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 93.

94. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 94, and leave all matters of law to the Honorable Court.

95. Upon information and belief deny those allegations set forth in paragraph numbered 95, and leave all matters of law to the Honorable Court.

96. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 96.

97. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 97, and leave all matters of law to the Honorable Court.

98. Upon information and belief deny those allegations set forth in paragraph numbered 98, and leave all matters of law to the Honorable Court.

99. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 99.

100. Deny each and every allegation set forth in the paragraph numbered 100, and leave all matters of law to the Honorable Court.

101. Upon information and belief deny those allegations set forth in paragraph numbered 101, and leave all matters of law to the Honorable Court.

102. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 102.

103. Deny each and every allegation set forth in the paragraph numbered 103, and leave all matters of law to the Honorable Court.

104. Upon information and belief deny those allegations set forth in paragraph numbered 104, and leave all matters of law to the Honorable Court.

105. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 105.

106. Deny each and every allegation set forth in the paragraph numbered 106, and leave all matters of law to the Honorable Court.

107. Upon information and belief deny those allegations set forth in paragraph numbered 107, and leave all matters of law to the Honorable Court.

108. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 108.

109. Deny each and every allegation set forth in the paragraph numbered 109, and leave all matters of law to the Honorable Court.

110. Upon information and belief deny those allegations set forth in paragraph numbered

110, and leave all matters of law to the Honorable Court.

111. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 111.

112. Deny each and every allegation set forth in the paragraph numbered 112, and leave all matters of law to the Honorable Court.

113. Upon information and belief deny those allegations set forth in paragraph numbered 113, and leave all matters of law to the Honorable Court.

114. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 114.

115. Deny each and every allegation set forth in the paragraph numbered 115, and leave all matters of law to the Honorable Court.

116. Upon information and belief deny those allegations set forth in paragraph numbered 116, and leave all matters of law to the Honorable Court.

Defendants' Business

44th Enterprise

117. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 117, and leave all matters of law to the Honorable Court.

118. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 118, and leave all matters of law to the Honorable Court.

119. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 119, and leave all matters of law to the Honorable Court.

120. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 120, and leave all matters of law to the Honorable Court.

121. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 121, and leave all matters of law to the Honorable Court.

122. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 122, and leave all matters of law to the Honorable Court.

123. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 123, and leave all matters of law to the Honorable Court.

124. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 124, and leave all matters of law to the Honorable Court.

125. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 125, and leave all matters of law to the Honorable Court.

MLB

126. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 126, and leave all matters of law to the Honorable Court .

127. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 127, and leave all matters of law to the Honorable Court.

128. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 128, and leave all matters of law to the Honorable Court.

129. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 129, and leave all matters of law to the Honorable Court.

130. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 130, and leave all matters of law to the Honorable Court.

131. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 131, and leave all matters of law to the Honorable Court.

132. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 132, and leave all matters of law to the Honorable Court.

133. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 133, and leave all matters of law to the Honorable Court.

134. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 134, and leave all matters of law to the Honorable Court.

Lace Entertainment

135. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 135, and leave all matters of law to the Honorable Court.

136. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 136, and leave all matters of law to the Honorable Court.

137. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 137, and leave all matters of law to the Honorable Court.

138. Deny knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 138, and leave all matters of law to the Honorable Court.

139. Deny each and every allegation set forth in the paragraph numbered 139, and leave all matters of law to the Honorable Court.

140. Deny each and every allegation set forth in the paragraph numbered 140, and leave all matters of law to the Honorable Court.

141. Upon information and belief deny those allegations set forth in paragraph numbered 141, and leave all matters of law to the Honorable Court.

142. Deny each and every allegation set forth in the paragraph numbered 142, and leave all matters of law to the Honorable Court.

143. Upon information and belief deny those allegations set forth in paragraph numbered 143, and leave all matters of law to the Honorable Court.

Stiletto Entertainment

144. Deny each and every allegation set forth in the paragraph numbered 144, except admits that STILETTO ENTERTAINMENT, LLC, d/b/a STILETTO'S owns Stiletto's located in Nanuet, New York, and leave all matters of law to the Honorable Court, and leave all matters of law to the Honorable Court.

145. Deny each and every allegation set forth in the paragraph numbered 145, and leave all matters of law to the Honorable Court.

146. Upon information and belief deny those allegations set forth in paragraph numbered 146, and leave all matters of law to the Honorable Court .

147. Upon information and belief deny those allegations set forth in paragraph numbered 147, and leave all matters of law to the Honorable Court.

148. Deny each and every allegation set forth in the paragraph numbered 148, and leave all matters of law to the Honorable Court.

149. Deny each and every allegation set forth in the paragraph numbered 149, and leave all matters of law to the Honorable Court.

150. Upon information and belief deny those allegations set forth in paragraph numbered 150, and leave all matters of law to the Honorable Court.

151. Deny each and every allegation set forth in the paragraph numbered 151, and leave all matters of law to the Honorable Court.

152. Upon information and belief deny those allegations set forth in paragraph numbered 152, and leave all matters of law to the Honorable Court.